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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND TIME
FOR:**

**THE PARTIES TO FILE THE
DISCOVERY PLAN AND
SCHEDULING ORDER
(SECOND REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader ("Plaintiff"), through her counsel Richard Harris Law Firm, Defendants Wynn Las Vegas, LLC ("WLV") and Wynn Resorts, Ltd. ("WRL"), through their counsel Jackson Lewis P.C., and Defendant Stephen Alan Wynn ("Mr. Wynn"), through his counsel Peterson Baker, PLLC, that the time for the Parties to submit the Discovery Plan and Scheduling Order, and for Defendant Mr. Wynn, that Plaintiff shall have an extension up to and including **May 13, 2022** to file a Rule 26 Scheduling Order.

This Stipulation is submitted and based upon the following:

1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for Stay of Discovery. ECF No. 57.
2. On February 17, 2021, the Court entered an Order that, among other things, granted, in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to certain

1 claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
2 Amended Complaint on February 17, 2021. ECF No. 90.

3 3. On March 2, 2021, the Parties stipulated to extend the time for all Defendants to
4 respond to the First Amended Complaint from March 3, 2021, to March 17, 2021. ECF No. 91. The
5 Court entered an order approving the Stipulation on March 9, 2021. ECF No. 92.

6 4. On March 11, 2021, the Parties stipulated to extend the time for all Defendants to
7 respond to the First Amended Complaint from March 17, 2021, to March 31, 2021. ECF No. 93.
8 The Court entered an order approving the Stipulation on March 15, 2021. ECF No. 95.

9 5. On March 31, 2021, Defendant Mr. Wynn filed his motion to dismiss Plaintiff's
10 First Amended Complaint. ECF No. 99. Defendant Mr. Wynn also moved on April 7, 2021, to stay
11 discovery pending the Court's decision on the pending motions to dismiss. ECF No. 101.

12 6. On April 7, 2021, Defendants WRL and WLV filed their motion to dismiss the First
13 Amended Complaint. ECF Nos. 103. Defendants WRL and WLV also filed their respective
14 Answers to Plaintiff's First Amended Complaint that same day. ECF No. 104 and 105. Defendants
15 WRL and WLV filed a motion to stay discovery pending decision on the motions to dismiss. ECF
16 No. 106.

17 7. On October 14, 2021, the Court entered an Order granting Defendants' respective
18 motions to stay discovery. ECF No. 139. Therein, the Court ordered "that the parties are to file a
19 joint, proposed discovery plan and scheduling order within 14 days after ECF Nos. 98, 99, and 103
20 are decided." *Id.* at p. 9.

21 8. On March 31, 2022, the Court entered an order granting, in part, and denying, in
22 part, Defendants' respective motions to dismiss. ECF No. 140. Defendant Wooden has been
23 dismissed from the case entirely. *Id.*

24 9. On April 11, 2022, the Court entered an order granting the parties' stipulation to
25 extend Defendant Stephen Alan Wynn's deadline to file an answer and also allow the parties
26 additional time to file a proposed scheduling order. ECF No. 142.

1 10. As such, the proposed discovery plan and scheduling order is currently due on April
2 28, 2022. In addition, pursuant to FRCP 12(a)(4)(A), Defendant Mr. Wynn's answer to the First
3 Amended Complaint is due on April 28, 2022. ECF Nos. 142.

4 11. Plaintiff's counsel has been preparing for trial set for May 5, 2022.

5 12. Due to the amount of work involved in preparing for said trial, Plaintiff will not be
6 able to meet with Defense counsel to discuss the discovery plan.

7 13. Due to the complexity of the issues related to the Plaintiff's complaint, and the
8 Defendants' answers, the parties will need to address numerous issues that will most likely require
9 considerable discussion.

10 14. In addition, Plaintiff respectfully requests an opportunity to view Defendant Stephen
11 Wynn's answer in order to adequately prepare for the Rule 26 conference.

12 15. At this time, the parties have scheduled to meet and discuss the plan on May 10,
13 2022 at 1 pm.

14 16. Based on the foregoing considerations, the Parties have agreed to extend the
15 deadline to submit the proposed scheduling order to May 13, 2022.

16 17. This Stipulation is made in good faith and not for the purpose of delay.

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1 18. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim or defense held by any party.

3 Dated this 26th day of April, 2022.

4 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

5 /s/ Burke Huber

/s/ Joshua A. Sliker

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15 *Attorney for Defendant*
16 *Stephen Alan Wynn*

17
18 **ORDER**

19 IT IS SO ORDERED:

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21 United States Magistrate Judge

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23 Dated: April 27, 2022